

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Latipah Sharde Johnson, Debtor

**Case No. 25-00910-JAW
CHAPTER 7**

NOTICE

The undersigned counsel for Debtor has filed papers with the court to redeem personal property.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the Application, or if you want the court to consider your views on the Application, then on or before 21 days, you or your attorney must:

File with the court a written request for a hearing at:

U.S. Bankruptcy Clerk
U.S. Bankruptcy Court
P.O. Box 2448
Jackson, MS 39225-2448

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

You must also mail a copy to the debtors' attorney:

The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
(601) 500-5533

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the Application and may enter an order granting that relief, which shall sustain this Motion to Redeem.

Date: May 27, 2025

Signature: /s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469)
Jennifer A Curry Calvillo (MSBN 104367)
The Rollins Law Firm, PLLC
PO Box 13767
Jackson, MS 39236
601-500-5533
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Latipah Sharde Johnson, Debtor

**Case No. 25-00910-JAW
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**MOTION FOR AUTHORITY TO REDEEM PERSONAL
PROPERTY AND APPROVAL OF ASSOCIATED FINANCING
AND ATTORNEY FEES UNDER 11 U.S.C. 722**

Now comes the Debtor by and through counsel, and moves the court pursuant to 11 U.S.C. 722 and Bankruptcy Rule 6008 for a Redemption Order on the following grounds:

1. Debtor filed a voluntary petition for relief under Chapter 7 of the Bankruptcy Code on 04/07/2025.
2. The item to be redeemed is tangible personal property intended primarily for personal, family or household use is more particularly described as:
 - a. 2016 Lincoln MKZ
 - b. VIN: 3LN6L260GR602981.
3. The interest of the Debtor in such property is exempt or has been abandoned by the estate and the debt (which is secured by said property to the extent of the allowed secured claim of the Creditor) is a dischargeable consumer debt.
4. The allowed secured claim of said Creditor for purposes of redemption, the “redemption value”, should be determined to be not more than \$4,125.00 as evidenced by the attached written appraisal.
5. Arrangements have been made by the Debtor to pay to the said Creditor up to the aforesaid amount in a lump sum should this motion be granted.
6. The payment for this proposed redemption is to be financed through Prizm Financial Company, LLC, with all of the particulars of that financing (interest rate, finance charge, amount financed, total of payments, amount of payments, etc.) set forth in full detail in

the attachments hereto. As demonstrated there, the monthly amount, term of the payments and the overall amount of the repayment will be decreased significantly through the proposed redemption. Moreover, the Debtor has agreed to borrow and disperse additional funds in the amount of \$700.00 from their loan with Prizm Financial Company, LLC, for representation of the debtor(s) in securing for the benefit of the debtor(s) an order granting the debtor(s) the right to redeem under 11 U.S.C. 722 a certain motor vehicle, such compensation being in addition to that previously disclosed and being for services rendered beyond the scope of the legal services to have been rendered for such compensation heretofore disclosed.

WHEREFORE, the Debtor requests the Court to order the said Creditor to accept from the Debtor the lump sum payment of the redemption value and release their lien of record. In the event the said Creditor objects to this motion, the Debtor requests the Court to determine the value of the property as of the time of the hearing on such objection.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MS Bar No. 103469)
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
601-500-5533

CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been served upon:

By Mail:

Westlake Portfolio Services, Inc.
Attn: Bankruptcy
PO Box 76809
Los Angeles, CA 90054

Westlake Portfolio Services, Inc.
c/o Corporate Creations Network, Inc
7 Professional Pkwy #101
Hattiesburg, MS 39402

By ECF notice:

U.S. Trustee

Chapter 7 Trustee

on this 27th day of May 2025.

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

Latipah Sharde Johnson

CASE NO: 25-00910

**DECLARATION OF MAILING
CERTIFICATE OF SERVICE**

Chapter: 7

On 5/27/2025, I did cause a copy of the following documents, described below,

Notice and Motion to Redeem

Exhibit A

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 5/27/2025

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401
601 500 5533
trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

Latipah Sharde Johnson

CASE NO: 25-00910

**CERTIFICATE OF SERVICE
DECLARATION OF MAILING**

Chapter: 7

On 5/27/2025, a copy of the following documents, described below,

Notice and Motion to Redeem

Exhibit A

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 5/27/2025



Miles Wood
BK Attorney Services, LLC
d/b/a certificateofservice.com, for
Thomas C. Rollins, Jr.
The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

FIRST CLASS

WESTLAKE PORTFOLIO SERVICES, INC.
ATTN: BANKRUPTCY
PO BOX 76809
LOS ANGELES CA 90054

FIRST CLASS

WESTLAKE PORTFOLIO SERVICES, INC.
C/O CORPORATE CREATIONS NETWORK, INC
7 PROFESSIONAL PKWY #101
HATTIESBURG MS 39402